

PD-1015-18

Ralph Watkins

vs.

THE STATE OF TEXAS

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**IN THE COURT OF
CRIMINAL APPEALS
OF TEXAS**

FILED
COURT OF CRIMINAL APPEALS
2/11/2019
DEANA WILLIAMSON, CLERK

**MOTION FOR AN EXTENSION OF TIME TO
FILE PETITION FOR DISCRETIONARY REVIEW**

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

COMES NOW the Appellant in the above-styled and numbered cause and respectfully moves this Honorable Court to allow oral argument by amicus curiae the Texas Criminal Defense Lawyer's Association and in support thereof would show to the Court the following:

1. This case is set for oral argument on February 20, 2019.
2. Amicus for the Texas Criminal Defense Lawyer's Association has filed a brief in support of Petitioner.
3. The Court's internal operating procedures provide for a total of twenty (20) minutes of argument per side. Counsel believes argument by Amicus will significantly aid the Court's decision making, and accordingly desires to allocate five (5) minutes of his time to Mr. Lane Haygood on behalf of the Texas Criminal Defense Lawyer's Association.

4. Mr. Haygood, as Amicus Counsel will file (or has filed) a Notice Letter with the Court that Amicus will be appearing at argument.

5. The Tenth Court of Appeals found argument by amicus curiae to be useful in their disposition of the case. Argument by Amicus may significantly assist the Court in its considerations of the policy implications of its decision.

6. Therefore, Appellant moves the Court for time distribution with the same to be verified with the Court's timekeeper prior to argument.

WHEREFORE, PREMISES CONSIDERED, the Appellant respectfully requests that this Honorable Court allow argument by amicus curiae the Texas Criminal Defense Lawyer's Association.

Respectfully submitted,

/s/ J. Edward Niehaus

J. Edward Niehaus

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ATTORNEY FOR APPELLANT

CERTIFICATE OF SERVICE

A true and correct copy of this Motion has been electronically served on the

State of Texas via Robert Koehl (rkoehl@navarrocounty.org) and the State Prosecuting Attorney's Office (information@spa.texas.gov) on this the 11th day of February 2019.

/s/J. Edward Niehaus

J. Edward Niehaus

CERTIFICATE OF COMPLIANCE

The contents of this Motion are compliant with Tex. R. App. P. Rule 9. Total Word Count is 415

/s/J. Edward Niehaus

J. Edward Niehaus

CERTIFICATE OF CONFERENCE

Having conferred with the State of Texas via Robert Koehl, counsel for Navarro County via email, the State has indicated it is UNOPPOSED to this Motion.

/s/J. Edward Niehaus

J. Edward Niehaus